

Appendix

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-155

As a result of the inspection conducted on June 21-25 and July 7, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures and drawings."

Consumers Power Company has committed in quality assurance program Topical Report CPC-2A, Rev. 0, to ANSI N18.7-1976, through Regulatory Guide 1.33, Rev. 2. ANSI N18.7-1976, paragraph 5.2.2, states in part, "Procedures shall be followed..."

The Consumers Power Company's Nuclear Operations Training Department Procedure Number 3, Revision 0, dated September 3, 1981, states in part, "The Training Supervisor of the particular location shall approve Lesson Plans used at his/her location."

- a. Contrary to the above, several of the licensed operator requalification training lesson plans, implemented after September 3, 1981, were not approved by the Training Supervisor.
- b. Contrary to the above, General Employee Retraining was not conducted as required by the Big Rock Point Plant Manual, Volume 18, "Master Training Plan".

This is a Severity Level V violation (Supplement I).

2. 10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances..."

Consumers Power Company has committed in quality assurance program Topical Report CPC-2A, Rev. 0, to ANSI N18.7-1976, through Regulatory Guide 1.33, Rev. 2. ANSI N18.7-1976, paragraph 5.3, states in part, "Activities affecting safety at nuclear power plants shall be described by written procedures of a type appropriate to the circumstances..."

Contrary to the above, the Big Rock Point Plant Manual, Volume 18, "Master Training Plan", is not appropriate since it contains conflicting requirements for retraining personnel in several areas, including quality assurance, applicable QA procedures and General Employee Training (GET) topics.

This is a Severity Level V violation (Supplement I).

3. 10 CFR 50, Appendix B, Criterion XVJ, states in part, "Measures shall be established to assure that conditions adverse to quality, . . . are promptly identified and corrected."

Consumers Power Company has committed in quality assurance program Topical Report CPC-2A, Rev. 0, to ANSI N18.7-1976, through Regulatory Guide 1.33, Rev. 2. ANSI N18.7-1976, paragraph 5.2.11, states in part, "The program shall provide measures to ensure that conditions adverse to plant safety, such as failure, malfunctions, deficiencies, deviations, defective material and equipment, abnormal occurrences and nonconformances are promptly identified and corrected."

Contrary to the above, the procedures which exist to control corrective action failed to assure that conditions adverse to quality which were identified in a QA audit of the Nuclear Operations Training Department (NOTD) were promptly corrected.

For example, QA audit report findings of NOTD training activities at the Big Rock Point Plant which were processed in accordance with the appropriate written procedures, were neither evaluated for corrective action nor corrected nearly 8 months after the audit report was issued.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

SEP 17 1982

Dated _____

C. E. Norelius

C. E. Norelius, Director
Division of Engineering and
Technical Programs